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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LUCERO SANCHEZ,

Plaintiff,

vs.

RENOWN HEALTH, a non-profit Nevada  
Corporation, and DOES 1-20, inclusive,

Defendant

Case No.: 3:21-cv-00352-MMD-CSD

**ORDER GRANTING STIPULATION AND  
[PROPOSED] ORDER FOR EXTENSION  
OF TIME TO FILE RESPONSE TO  
PLAINTIFF'S OBJECTION TO  
MAGISTRATE JUDGE'S REPORT AND  
RECOMMENDATION  
[FIRST REQUEST]**

Plaintiff Lucero Sanchez and Defendant Renown Health (collectively, the "Parties"), by and through their counsel of record, hereby stipulate and agree that the deadline for Renown to file its response to Plaintiff's Objection to Magistrate Judge's Report and Recommendation (ECF No. 109) be extended for a period of forty-five (45) days, up to and including October 21, 2024, while the Parties negotiate the resolution of this matter as explained more fully below.

Following the issuance of Magistrate Judge Denney's Report and Recommendation dated August 9, 2024 (ECF No. 108), the Parties initiated negotiations to resolve this matter. After Plaintiff filed Objections to Magistrate Judge Denney's Report and Recommendation but before Renown's response to Plaintiff's Objections became due on September 6, 2024, the Parties reached a tentative resolution of this matter. The Parties are in the process of reducing the material terms of their agreement to writing and believe that they will be able to file a stipulation for dismissal with prejudice in the near future. However, in order to provide sufficient time for Plaintiff to review

and consider the terms of the settlement agreement required by the Older Workers Benefit Protection Act ("OWBPA"), but avoid Renown's waiver of its ability to respond to Plaintiff's Objections in the unlikely event that the Parties cannot reach a written agreement, the Parties stipulate to extend the deadline for Renown's response to Plaintiff's Objections by a period of forty-five (45) days up to and including October 21, 2024.

As previously stated, the Parties believe that they will be able to finalize a written settlement agreement, allow for the requisite consideration and revocation periods under the OWBPA to expire, and file a stipulation for dismissal with prejudice within this 45-day period but hereby submit this stipulation in order to protect Renown's ability to respond to Plaintiff's Objections until a formal and final settlement is reached. This stipulation is made in good faith and not for purposes of delay.

Dated: September 3, 2024

Dated: September 3, 2024

/s/ Luke Busby

LUKE BUSBY, ESQ.  
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Reno, NV 89509

*Counsel for Plaintiff*

/s/ Sandra Ketner


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*Counsel for Defendant, Renown Health*

## ORDER

**IT IS SO ORDERED.**

Dated this 3rd day of September 2024.



U.S. District Judge